

AO 91 (Rev. 11/11) Criminal Complaint

Sealed

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UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

February 03, 2023

United States of America)
v.)
Jeremy James JOSEPH) Case No.
)
)
)
)
)

Nathan Ochsner, Clerk of Court

4:23-mj-210

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 22, 2023 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

Title 18, USC 875(c)

Offense Description

Transmitting in Interstate or Foreign Commerce a Communication Containing
a Death Threat

This criminal complaint is based on these facts:

See attached.

Continued on the attached sheet.

Complainant's signature

FBI/TFO Courtney McLaughlin

Printed name and title

Sworn to before me by telephone

Date: 02/03/2023

Judge's signature

City and state: Houston, Texas

United States Magistrate Judge Peter Bray

Printed name and title

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA,

v.

JEREMY JAMES JOSEPH
Defendant.

Case No. **4:23-mj-210**

Filed Under Seal

Affidavit in Support of Application for Complaint

I, Courtney McLaughlin, being duly sworn, declares under penalty of perjury and states as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Task Force Officer with the Federal Bureau of Investigation (FBI) and assigned to the FBI Houston Division, Joint Terrorism Task Force (JTTF) which is comprised of agents from the FBI, Officers from the Houston Police Department (HPD), Deputies from the Harris County Sheriff's Office (HCSO), and Special Agents from the United States Secret Service. I am primarily responsible for investigating matters concerning National Security. I have been a Task Force Officer with the FBI for approximately thirteen years and have been a sworn Peace Officer in the State of Texas for sixteen years.

2. Based on the facts and circumstances outlined below, there is probable cause to believe that Jeremy James JOSEPH did transmit in interstate or foreign commerce any communication

containing any threat to injure the person of another, in violation of Title 18, United States Code, Section 875(c).

3. The information contained in this affidavit is information based on the personal knowledge of the Affiant, as well as information provided to the Affiant by other Agents assigned to this investigation, and information received from multiple cooperating public entities, information and evidence obtained through physical surveillance, and other investigative techniques. The purpose of this search warrant affidavit is solely to establish probable cause; therefore, not every fact known to law enforcement is included in the affidavit.

PROBABLE CAUSE

4. In late October, 2022 law enforcement in Harris County, Texas were notified that a Harris County Probate Judge had been threatened by a party to a case he was adjudicating. According to the Judge, Jeremy James JOSEPH had been harassing him and his staff at the court, including threats of gun violence. The Judge related that the harassments and threats started almost a year prior when a woman who is now deceased had disinherited her son (JOSEPH) from her will. JOSEPH filed a contest to the will and hired and fired multiple lawyers. JOSEPH flooded the court's electronic filing system with online filings and was eventually banned from filing pleadings electronically. After being banned, JOSEPH began sending hundreds of emails directly to the Judge and probate staff, and

even tried impersonating the Judge by creating an encrypted email account through Proton Mail.¹ Eventually, JOSEPH's threats to the Judge and his staff escalated to include gun violence.

5. According to a resume presented by JOSEPH to a former employer, JOSEPH is a graduate of Rice University where he earned a Bachelor of Science degree in bioengineering, a graduate of the University of Washington School of Medicine where he earned a Master of Science in bioengineering and an attendee at Stanford University where he was working towards a Master of Science in Business and Management.

6. Commencing in late 2022, JOSEPH escalated, making numerous electronic threats towards various government officials, Harris County Courts and staff of courts, media personalities and outlets, hospitals and Harris County law firm personnel in which JOSEPH threatened to kill persons by various means, including with firearms and pipe bombs.

7. On January 11, 2023, the Agenda and Communication Director for a Houston City Council member received an email from a fictitious email account with the subject line, "Pyrodex," copying the spouse of the employee who is an attorney working in Harris County, Texas courts. This email was similar in form and content to emails received by the Harris County Probate Court from JOSEPH.

¹ Proton Mail is the world's largest end-to-end encrypted email service. Proton Mail makes sure that no one can access its senders' emails by using end-to-end encryption and zero-access encryption.

In the body of the email, the sender identified the spouse of the City Council employee by name and referenced having possession of boxes of "pyrodex² and lewisite³." Additionally, the email states that the sender has a stockpile of pipe bombs in Sarnia, Ontario, Canada, claiming that it is easier to obtain the components used to make the bombs in Canada. The email asked, "*are those distraction bomb threats working?*"⁴ The email further stated, "*[s]peaking of - are we sure we can't take out that [N-word] Sylvester turner? Houston needs better mayor, Fucking ruining everything.*"

8. On January 22, 2023, an email from the account jeremyjamesjosephsept1982@outlook.com, with the subject line, "I have a Gun and Bombs and I'm going to kill you" was received by members of the media including CNN, the Dallas News and ABC local news KTRK, as well as numerous other recipients. The body of the email identified the sender as "Jeremy James Joseph Born September 29. 1982 in Texas," and states, "*Jeremy James Joseph Born September 29, 1982 in Texas. Stanford GSB and Rice University unhinged, manic, (sic) and ready to kill you - ABC 13 News!! . . . All of*

² Pyrodex is a propellant designed for use in muzzleloading and black powder cartridge arms.

³ Lewisite is an extremely toxic, arsenic-containing blister agent that affects the lungs and causes whole-body effects.

⁴ JOSEPH has made numerous threats towards public figures and private persons involving the use of pipe bombs in other federal districts, including the Southern District of New York and the Middle District of California, as well as in Ontario, Canada.

you! I HATEEEEEEEEEE! I WANT TO KILL! I WANT TO CUT YOU UP! YOU HORRIBLE PEOPLE! . . . I HAVE A GUN AND IM OUTSIDE YOUR STATION NOW IN A CAR WAITING. WAITING FOR THE MOMENT TO KILL YOU ALL. I hate your station ABC 13. Disgusted by you. Every time I see you. Your breaking news. I imagine ripping your jaw off your skull. Assault rifle. Semi-Automatic. I bought off Craigslist. I practiced on kittens and puppies. They squealed as the bullets rained on them. I imagine you squealing too as I pump round into you. No more breaking news! I am going to stop you now!" The email was signed, "JEREMY JOSEPH."

9. Again on January 22, 2023, an email, this time from the account jeremyjamesjoseph09291982@outlook.com, with the subject line, "Mass Shooting & Bombings in Houston by Jeremy James Joseph - Blood will be in the streets," was received by members of the national and local media as well as employees of the Harris County Probate Court and lawyers working in the Harris County courts. The body of the email stated, "I Jeremy James Joseph Born September 29, 1982 in Port Arthur, Texas will rage gunfire and bombs on Harris County and on the disgusting Jews, lesbians and Spics of the Probate Court of Harris County. The Mass Shooting of California is nothing. Bodies will be purged of their blood - carcasses littering the hallways. Screams of pain and agony as chunks of flesh fly off your bodies and pieces of skull plaster the wall with the bright redness of blood I will purge this world of the

corrupt and disgusting jews that defile our lives, slit the throats of ugly hag lesbians that choke our world of freedom, and build a wall of guts and glory of fat spics who stuff their faces of chalupas and doughnuts. I will seek vengeance on the steps of South Beach⁵ and litter the faggots with bullets hoping to spray the disgusting homosexual that is (name omitted). And I'll throw his carcass into traffic as he gets trampled by crowds of people trying to escape the frenzy - fleeing with their lives in vain attempts as bullets land in their calves and backs. Synagogues and Churches will be next - sinners of vileness and greed and approve abortion the death of innocent babies all while fornicating in sin themselves. Mosques with the evil fucking Mohammed worshippers that come to our great country and think they can change us. I have pipe bombs equipped galore so as people run away they will encounter explosions ripping off their faces across the streets and pavements. Their screams a melody of righteousness and all that should be righted in this world. Jews, Sinners, Gluttons, and more - all finally getting justice and that is the welcomed death. COME on my journey. Build bombs and get your guns and lets take this County back and create our own purge. (Probate judge's name omitted) first on their list and they live in Meyerland. (Attorney's name omitted) in the Heights. (Attorney's name omitted)

⁵South Beach is a LGBTQ bar located in Houston, Texas.

omitted) in NW. Then we take to the center of Houston and kill them all." The email was signed, "Jeremy James Joseph, Born September 29, 1982".

10. Again on January 22, 2023, an email, this time from the account jeremyjamesjosephhouston@outlook.com, with the subject line, "Unhinged Jeremy Joseph to kill students at Rice University and Staff at Houston Chronicle" was received by employees of Rice University and staff at the Houston Chronicle, among others. The body of the email stated, "I have guns. I have pipe bombs. It's not justice. It's desire. I will come and kill you all while you slave away on a Monday. Busy with "Catch-up Meetings" the bombs will slay. Your blood will spray and I'll say "Yah." The email was signed, "Jeremy James Joseph, Rice University Alum, Disgruntled Lunatic Maniac With Guns and Pipe Bombs to Satisfy Mania, Born September 29, 1982." As a result of this threat, the Houston Chronicle sent its employees home for the day.

11. Again on January 22, 2023, an email from the account jeremyjamesjoseph09291984@outlook.com, with the subject line, "Blood and Guns for you fuckers at Houston Methodist" was received by employees of Houston Methodist Hospital⁶ as well as members of the local news media. The body of the email stated, "I've got guns. I've got bullets. I'm going to come up there and kill you all," "I

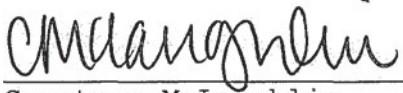
⁶ JOSEPH's mother was treated at Houston Methodist prior to her death.

*have pipe bombs that I have placed on the perimeter," "I have a nurse uniform and a badge from a n***** I've killed here in Houston already. Guns off Craigslist [sic]. Now I just need Houston Methodist Employee's blood . . . I am crying now. Smoking meth! Going to kill you. I am in a car looking and you are not in the hospital yet, but I will get you when you go in. All of you die die die die die." The email was signed, "Jeremy Joseph 09/29/1982 only son of Stella Lucille Joseph[.]"*

CONCLUSION

12. Based on the foregoing, I believe there is probable cause that Jeremy James JOSEPH has transmitted in interstate and foreign commerce a threat to injure the person of another in violation of Title 18, United States Code, Section 875(c) .

Respectfully submitted,


Courtney McLaughlin
FBI/TFO/JTTF Officer

Subscribed and sworn to before me telephonically on February 3, 2023, and I find probable cause.


PETER BRAY
United States Magistrate Judge